

**IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF PENNSYLVANIA**

THE MIDDLE EAST FORUM	:	CIVIL ACTION
	:	
	:	NO. 2:19-cv-05697-JS
Plaintiff,	:	
	:	
v.	:	
	:	
LISA REYNOLDS-BARBOUNIS	:	
	:	
Defendant.	:	
	:	

DECLARATION OF LISA REYNOLDS-BARBOUNIS

I Lisa Reynolds-Barbounis who resides at 1820 Kilbourne Place, Northwest, Washington D.C. 20010, in the United States of America do hereby make OATH and say at follows:

1. My name is Lisa Reynolds-Barbounis.
2. Today is December 4, 2020
3. Pursuant to the Court's November 25, 2020, Order, I contacted Cornerstone today and spoke with an individual named Kyle.
4. I was directed to call Cornerstone and ask for Kyle by Robert Centofanti, who I understand communicated this information to my attorney, Seth D. Carson.
5. I spoke to Kyle at Cornerstone on December 4, 2020 at approximately 3:00 P.M.
6. My attorney, Seth Carson read the November 25, 2020, Court Order to Kyle which stated that I was compelled to provide account login information for Proton Mail, Facebook, Wickr, Telegram, and Single.
7. I provided the login credentials to Kyle for my Facebook and Proton Mail accounts, and Kyle stated that he accessed both accounts while we were on the telephone.
8. The only Proto Mail account to which I have access, I started recently.

9. The only other Proton Mail account that I have used does not belong to me. I no longer have access to this account. It is not my account and I am no longer authorized to access the account.
10. The Facebook account to which I provided access is connected to Congressman Randy Weber's Business Facebook Page. This is not my Facebook Page, however, part of my job responsibilities in my employment for Congressman Weber include managing his Business Facebook Page.
11. Accordingly, I cannot authorize Cornerstone to access Congressman Randy Weber's Facebook Page.
12. I did provide Cornerstone with access to my Facebook page and they accessed the information while we were on the telephone.
13. Cornerstone stated to me that they were unable to access any Telegram, Wickr, or Single account through login credentials.
14. Cornerstone communicated to me, through Kyle, that there was no way to access this information as data from these accounts resides on the device.
15. I believe Cornerstone meant that the information from any Telegram, Single, or Wickr account would have been on my telephones when they were imaged in February 2020.
16. I offered to do whatever they needed to access any of these accounts including Telegram and Single.
17. I do not have a Wickr account.
18. I provided my attorney with access to my Telegram account through a Telegram desktop application today.
19. I will provide Cornerstone access to any account they need including Telegram or Single. Cornerstone informed me that they cannot access these accounts during today's call.
20. I swear under penalty of perjury that the foregoing is accurate, true and correct.

Signature of Declarant: 

Name of Declarant: Lisa Barbounis

Date: December 4, 2020

Exhibit A